

### **Working Connections Child Care – Comments on Draft Rule Changes**

The following are public comments received in June and July 2008 on a *preliminary draft* of changes to the Working Connections Child Care rules in WAC chapter 170-290. For more information, or to review the preliminary draft, [see this link](#) or contact the DEL Rules Coordinator at [rules@del.wa.gov](mailto:rules@del.wa.gov).

**There will be another opportunity for public comments when the formal proposed rules are filed as required by RCW 34.05.320.** DEL will post the rules, take written comments, and hold public hearings before adopting the changes as permanent.

**Comment #1**, received June 30, 2008.

The role of the fraud investigator needs work.

If parents can (and will) refuse at their door then why spend tax dollars to send that investigator to the client's door? Why even attempt to use an investigator? Is there an alternative to this waste of money?

**Comment #2**, received June 30, 2008.

In my quick review there appears to be a discrepancy in these two paragraphs [highlighted in yellow].

**WAC 170-290-0025 What rights do I have when I apply for or receive WCCC benefits?**

You have the right to:

. . . (10) Refuse to speak to a fraud early detection (FRED) investigator from the department of social and health services division of fraud investigations (DFI). Ask the fraud early detection (FRED) investigator from the division of fraud investigations (DFI) to come back at another time. You do not have to let an investigator into your home. You may ask the investigator to come back at another time. This Such a request will not affect your eligibility for benefits. If you refuse to cooperate (provide the information requested) with the investigator, it could affect your benefits.

**WAC 170-290-0030 What must I do when I apply for or receive WCCC benefits?**

. . . (7) Cooperate with the fraud early detection (FRED) investigator. If you refuse to cooperate (provide the information requested) with the investigator, it could affect your benefits.

*From what I understand of the intent, I believe you may remedy the “apparent” conflict by making the following changes to WAC 170-290-0025; paragraph 10*

(10) Refuse to speak to a fraud early detection (FRED) investigator from the department of social and health services division of fraud investigations (DFI) with out an appointment. Ask the fraud early detection (FRED) investigator from the division of fraud investigations (DFI) to come back at another time. You do not have to let an investigator into your home, with out an appointment. You may ask the investigator to come back at another time. This Such a request will not affect your eligibility for benefits. If you refuse to cooperate (provide the information requested) with the FRED/DFI investigator, it could affect your benefits.

**Comment #3**, received June 30, 2008.

Here are my suggestions.

(WAC) 170-290-0031 (2) add Immediate notification is needed when subsidy is terminated. Providers continue to provide care without any notice that the parents have become ineligible for subsidy.

170-290-0115 add that notification will also be sent to the provider.

170-296-0120 Change DSHS secretary's list to DEL's list of permanently disqualifying convictions. And change all subsequent mention of DSHS list.

170-296-0125 Change all mention of WAC 388-155 to 170-296 And change all subsequent mention of WAC 388-155

170-296-0190 (3) (a) Family child care homes can not have children over ten hours unless it is due to travel

170-296-0205 (5) (b) relative needs to be defined. Can an aunt take care of their niece if the aunt is a licensed family child care, what about a cousin if they are licensed?

170-290-0273 (1) (e) add over the capacity that their license allows.

**Comment #4**, received July 2, 2008.

*Under:*

WAC 170-290-0010: 3) You and your children are eligible under WAC 388170170-290-0020;

*You have '170' twice.*

WAC 170-290-0032 (3) ... contracted day care provider is allowed to bill (see publication Child Care Subsidies, A Booklet for Licensed and Certified Child Care Providers, DSHSDEL 22-877). An overpayment for absent days can occur when you use care when you are not eligible for WCCC and can be up to five days per month .

*The sentence would read better if the underlined 'when' is removed.*

WAC 170-290-0090 (3) For the first full month following the month you get a job when you first apply for WCCC and we payare eligible for WCCC benefits;

*I suggest: For the first full month following the month you get a job, apply for and are found eligible for, WCCC benefits.*

WAC170-290-0105 (4) If you give the requested application information to us anytime after your eligibility period ends, we determine you are eligible for WCCC and you:

*Suggest: ... eligibility period ends, AND we determine....*

**Comment #5**, received July 14, 2008.

WAC 170-290-0200 Comments on the daily rates. We would like to suggest that DSHS pay providers per month per child. That is how we charge. We do not charge by the day. We are not a childcare drop-in facility. The families register and enroll the children for the school year.

65% of the children we serve are on DSHS. (53 out of 80 children) We do not know how much longer we can continue serving children on DSHS if we do not get paid for them per month.

We run a licensed childcare. [personal information deleted] We charge by the month. People who are not on DSHS have to pay per month.

We are open 6:30 AM to 7:00 PM Monday through Friday.

We take kids ages 5 years to 13 years.

We drive kids to school and pick them up from school.

We run schools-out programs and camps when there is no school.

We have 8 vans that we take and pick up kids to and from 13 different schools.

When school is out we offer full day winter, fall and summer camps.

We have trained staff hired depending on the enrollment per year.

The staff are hired and Stars Trained and show up every day starting at 6:30 AM.. We plan for trained staff, food, supplies, gas, vans, van drivers, buses, bus driver and field trips fees for the 80 kids per month.

The programs we offer include homework help, tutoring, a computer lab, Leadership and Citizenship Development, Career and Educational Development, the Arts, Health and Life Skills and Sports, Physical Education and Recreational Activities.

The way it is now if 1 child on DSHS does not show up we lose \$27 per full day payment. If 10 children on DSHS do not show up we lose \$270 per day. If 10 children on DSHS do not show up for 1 week we lose \$2700 per week. Financially we cannot continue to run a program this way.

We would like to continue serving families on DSHS because our mission is to help the children and families that need us the most. We may not be able to continue helping DSHS families and children without getting paid per month.

Please help us continue serving the children that need us the most. We have alumni that say we were the positive influence in their lives. We helped them stay in school. We helped them graduate from High School. We helped them become positive role models and good citizens. They say we have "Saved Their Lives".

*[personal information deleted]*

Thank you for taking these comments/suggestions seriously.